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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CORINNE SOLOMON, an individual, Plaintiff, vs. BRETT JACOBSON, an individual; LOTTO LOTTO GAMZ ETC., INC., a Delaware corporation; DOES 1 through 25, inclusive, Defendants.	Case No. 2:15-cv-01453-VAP-JPR **DISCOVERY MATTER** **PLAINTIFF CORINNE SOLOMON'S NOTICE OF MOTION TO COMPEL RESPONSES TO INTERROGATORIES AND REQUESTS FOR PRODUCTION FROM DEFENDANT BRETT JACOBSON** [Filed Concurrently Herewith: Motion to Compel; Van Ackeren Declaration; [Proposed] Order] Judge: Hon. Jean P. Rosenbluth Date: March 3, 2016 Time: 10:00 a.m. Crtrm.: A – 8th Floor Discovery Cut-Off: March 18, 2016 Pretrial Conference: June 27, 2016 Trial: July 26, 2016

TO DEFENDANT BRETT JACOBSON:

PLEASE TAKE NOTICE that on March 3, 2016, at 10:00 a.m., in Courtroom A – 8th Floor of the United States District Court, Central District, located at 312 North Spring Street, Los Angeles, California 90012-4701, Plaintiff Corinne Solomon ("Plaintiff" or "Solomon") will move the Court for an order compelling

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Defendant Brett Jacobson ("Defendant" or "Jacobson") to respond to the first sets of Interrogatories and Requests for Production Solomon propounded to him in this action pursuant to Rule 37(a)(3)(B)(iii) and (a)(3)(B)(iv) of the Federal Rules of Civil Procedure on the ground that Jacobson served objections only and failed to answer any of the Interrogatories and failed to produce any documents in response to the Requests for Production. Solomon also seeks sanctions against Jacobson in the amount of the reasonable attorneys' fees she incurred in bringing this Motion pursuant to Rule 37(a)(5) and Central District Local Rule 37-4.

This Motion is made pursuant to Central District Local Rule 37 and following a meet and confer that counsel for Solomon initiated with Jacobson's former counsel on January 8, 2016, and which was held on January 12, 2016. Jacobson and his counsel failed to serve amended/supplemental responses and documents by the agreed-to deadline of January 22, 2016. Following counsels' withdrawal, a draft Joint Stipulation was sent directly to Jacobson, but he failed and refused to provide his portions. The meet and confer process is described in further detail in the Declaration of John D. Van Ackeren filed concurrently herewith.

This Motion is based upon this Notice, the Motion to Compel filed concurrently herewith, the Declaration of John D. Van Ackeren and Exhibits thereto filed concurrently herewith, the files and records in this action, and any further evidence or argument that the Court may properly receive at or before the hearing.

DATED: February 4, 2016 FREEMAN, FREEMAN & SMILEY, LLP

By: */s/ John D. Van Ackeren*
STEVEN E. YOUNG
JOHN D. VAN ACKEREN
Attorneys for Plaintiff CORINNE SOLOMON

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Orange, State of California. My business address is 1920 Main Street, Suite 1050, Irvine, California 92614.

On February 4, 2016, I served true copies of the following document(s) described as **PLAINTIFF CORINNE SOLOMON'S NOTICE OF MOTION TO COMPEL RESPONSES TO INTERROGATORIES AND REQUESTS FOR PRODUCTION FROM DEFENDANT BRETT JACOBSON** on the interested parties in this action as follows:

SERVICE LIST

Brett Jacobson brett@mylottolotto.com	In Pro Per and as the registered agent for Defendant Lotto Lotto Gamz Etc., Inc.

BY E-MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from e-mail address john.vanackeren@ffslaw.com to the persons at the e-mail addresses listed in the Service List. I sent this transmission at approximately 3:30 p.m.. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 4, 2016, at Irvine, California.

/s/ John D. Van Ackeren
John D. Van Ackeren